

## **REMARKS**

Applicant amends claim 1 and adds new claims 8-20. No new matter has been added by this amendment. Support for the amendment can at least be found in the Figures, the originally filed claims, and in the specification at p. 13, lines 13-16; p. 15, lines 3-4; p. 24, line 27 to p. 25, line 6; p. 26, lines 7-21; and p. 27, line 8 to p. 28, line 4. Claims 1-20 are currently pending.

### **Rejections under 35 U.S.C. § 102**

As a preliminary note, Applicants note that none of the prior art cited in the September 21, 2005 Office Action discloses concavo-convex reflecting portions or pyramidal-shaped light directing portions according to the presently (and previously) claimed subject matter. Instead, the cited prior art discloses prism sheets having edged groove structures having a triangular/chevron cross section.

The claimed embodiments include three-dimensional structures in the form of spherical/elliptical depressions and/or pyramidal shaped polygonal/circular base structures having faces meeting at a common point. Such structure(s) provide the benefit that “though the light emitted from the light source to the light guide plate is emitted from the other side of the light guide plate to the outside, the emitted light is reflected by the minute concavo-convex portion of the diffusive reflector and is incident on the light guide plate again...[making it]...possible to reduce the loss of light and to efficiently use the light emitted from the light source to the light guide plate as illumination light” (p. 4, line 26 to p. 5, line 6). In addition, the pyramidal-shaped structures can facilitate control of light transmission in two different directions using a single directivity control sheet instead of two conventional prism sheets having a cross-sectional chevron pattern, can therefore simplify the manufacturing process and/or reduce the associated costs.

**Jeon et al. (US 6,729,737)**

Claims 1-7 were rejected under 35 U.S.C. §102(e) as being anticipated by Jeon et al. (US 6,729,737; hereinafter "Jeon"). According to the Examiner, Jeon discloses a diffusive reflector 141 having minute concavo-convex light reflecting portions facing the second surface of the light guide plate. Applicants traverse the argument that 141 constitutes a diffusive reflector or that its surface includes concavo-convex reflecting portions facing a second surface of the light guide plate. Instead, Jeon discloses a light guide 140 having prismatic patterns 141 on a second surface of the light guide 140. Accordingly, Applicants have not amended claim 1 for purposes of patentability over the prior art, but to more particularly define a preferred embodiment according to the presently claimed invention. In particular, newly amended claim 1 recites a backlight unit comprising a light source, a light guide plate, a diffusive reflector disposed to face a second surface of the light guide plate opposite to an emission surface of the light guide plate, and an air space or adhesion layer disposed between the light guide plate and the diffusive reflector.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); MPEP 2131. Jeon fails to disclose each and every claim limitation recited in newly amended claim 1 for the above-stated reasons and in view of Jeon's failure to disclose or suggest a diffusive reflector disposed to face a surface opposite to the emission surface of the light guide plate and an air space or adhesion layer disposed between the light guide plate and the diffusive reflector according to newly amended claim 1 (and claims 2-7 depending therefrom).

In addition, claim 1 (and claims 2-7 depending therefrom) recites an air space or adhesion layer disposed between the guide plate and the diffusive reflector having minute concavo-convex portions, wherein the surface having the minute concavo-convex portion faces the second surface opposite to the emission surface of the light guide plate. However, Jeon fails to disclose or suggest such a structure. Since Jeon fails to teach or suggest each and every element set forth in the rejected claims, either

expressly or inherently, Jeon does not anticipate the presently claimed subject matter. Accordingly, Applicants respectfully request withdrawal of this rejection.

**Hosseini et al. (US 6,347,873) or Kuo (US 6,705,739) or Matsumoto et al. (US 6,502,947)**

Claims 1-7 were rejected under 35 U.S.C. §102(e) as being anticipated by Hosseini et al. (US 6,347,873; hereinafter “Hosseini”) or Kuo (US 6,705,739) or Matsumoto et al. (US 6,502,947; hereinafter “Matsumoto”). Neither of Hosseini, Kuo or Matsumoto disclose or suggest a diffusive reflector disposed to face a surface opposite to the emission surface of the light guide plate and an air space or adhesion layer disposed between the light guide plate and the diffusive reflector. In addition, Hosseini, Kuo or Matsumoto fail to disclose e.g., a diffusive reflector having concavo-convex portions or a light directivity control sheet having a plurality of pyramid-shaped objects formed on a base. Since neither of Hosseini, Kuo or Matsumoto teaches or suggests each and every element as set forth in the claim is found, either expressly or inherently, neither of Hosseini, Kuo or Matsumoto anticipates the presently claimed subject matter. Accordingly, Applicants respectfully request withdrawal of this rejection.

**Tai et al. (US 5,926,601) or Tai et al. (US 5,390,276)**

Claims 1-4 and 6-7 were rejected under 35 U.S.C. §102(b) as being anticipated by Tai et al. (US 5,926,601; hereinafter “‘601 patent”) or Tai et al. (US 5,390,276; hereinafter “‘276 patent”). Neither the ‘601 patent, nor the ‘276 patent discloses or suggests a diffusive reflector disposed to face a surface opposite to the emission surface of the light guide plate and an air space or adhesion layer disposed between the light guide plate and the diffusive reflector. In addition, Hosseini, Kuo or Matsumoto fail to disclose e.g., a diffusive reflector having concavo-convex portions or a light directivity control sheet having a plurality of pyramid-shaped objects formed on a base. Since neither of the ‘601 or ‘276 patents teaches or suggests each and every element as set forth in the claim is found, either expressly or inherently, neither the ‘601, nor the ‘276

patent anticipates the presently claimed subject matter. Accordingly, Applicants respectfully request withdrawal of this rejection.

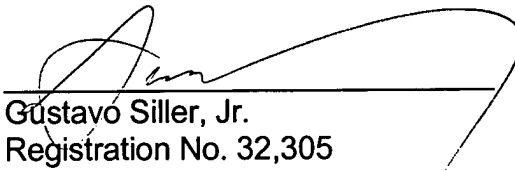
#### **New claims 8-20**

New claims 8-20 are directed to a backlight unit or an LCD device comprising the same having a diffusive reflector disposed to face a second surface of a light guide plate opposite to the emission surface in which the diffusive reflector includes a plurality of light reflecting concavo-convex portions. The cited prior art does not disclose or suggest such structures for the above reasons. Since the cited prior art does not teach or suggest each and every element set forth in claims 8-20, either expressly or inherently, Applicants submit that the cited prior art does not anticipate the presently claimed subject matter.

#### **Conclusion**

Applicants respectfully submit that the application is in condition for allowance. The Examiner is respectfully requested to contact the undersigned in the event that a telephone interview would expedite consideration of the application.

Respectfully submitted,



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